

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE:

ANDREW PAUL CHAMBERLAND	:	CASE NO. 20-60300
	:	CHAPTER 11
	:	JUDGE REBECCA CONNELLY

EXHIBIT A

**AMENDED¹ DECLARATION IN SUPPORT OF APPLICATION TO RETAIN AND
EMPLOY COX LAW GROUP PLLC AS COUNSEL FOR DEBTOR AND DEBTOR-
IN- POSSESSION *NUNC PRO TUNC***

I, H. David Cox, am a member in good standing of the Virginia State Bar and I am admitted to practice before the District Court for the Western District of Virginia and the United States Bankruptcy Courts of Virginia. I am a member of Cox Law Group PLLC (“Cox Law Group PLLC”) and am authorized to make this Declaration on behalf of my law firm. The facts set forth in this statement are personally known to me and, if called as a witness, I would testify as follows:

1. Cox Law Group PLLC is experienced in the services it has agreed to perform.
2. Neither Cox Law Group PLLC nor any member thereof is associated with: (a) the Debtor; (b) the creditors of the Debtor and other parties in interest; (c) parties to significant litigation with the Debtor; (d) any other professional that the Debtor, creditors, and other parties in interest have identified for employment in this case in applications filed on or since the petition date; (e) the United States Trustee; or (f) any persons employed in the Office of the United States Trustee, except as follows: In the first quarter of 2019, the debtor and a second individual, a relative and business associate of the debtor, consulted with the

¹ This Declaration is amended to correct the date noted in paragraph 2.

undersigned proposed counsel about debt related issues. The second individual and the debtor owned and operated a construction company that had ceased operations, and certain creditors related to that business pursued collections against them in their individual capacities. The second individual ultimately did not retain, compensate nor hire the undersigned counsel for bankruptcy or any other legal matter. The second individual did, however, consent to the undersigned counsel's representation of the debtor.

3. Except as otherwise disclosed in this Declaration, Cox Law Group PLLC has not represented the Debtor, its creditors or any other parties in interest, or their respective attorneys, in any matter relating to the Debtor or its estates. If any conflicts of interest arise, I will immediately disclose such conflicts to the Court, the U.S. Trustee, and appropriate creditors and other parties in interest. The proposed employment of Cox Law Group PLLC is neither prohibited by nor improper under Bankruptcy Rule 5002. Cox Law Group PLLC and the professionals it employs are qualified to represent the Debtor in the matters for which the firm is proposed to be employed.

4. To the best of my knowledge, neither I nor my firm holds or represents an interest adverse to estate of the Debtor.

5. Prior to the Petition Date, Cox Law Group PLLC was paid \$2,750.00 for pre-petition services and the Chapter 11 filing fees. Neither I nor my firm has received any compensation during this case post-petition. To the extent any compensation is awarded to my firm, neither my firm nor I have agreed to share any compensation paid in this case with any other party.

6. The fees Cox Law Group PLLC has agreed to charge in this case are set forth in the Engagement Agreement attached to the Application. Cox Law Group PLLC and its professionals understand that detailed records of time and expenses must be kept.

Dated: February 28, 2020

/s/ H. David Cox

By: /s/ H. David Cox
H. David Cox, Esquire (VSB #38670)
David@coxlawgroup.com
David Wright, Esquire (VSB#40424)

Dave@coxlawgroup.com
Janice Hansen, Esquire (VSB#66603)
Janice@coxlawgroup.com
Heidi Shafer, Esquire (VSB#48765)
Heidi@coxlawgroup.com
COX LAW GROUP, PLLC
900 Lakeside Drive
Lynchburg, Virginia 24501
434/845/2600
434/845/0727 (Facsimile)
Proposed Counsel for the Debtor/Movant

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2020 a copy of the foregoing *Amended Declaration in Support of Debtor's Application to Employ Cox Law Group PLLC As Attorneys Nunc Pro Tunc to the Petition Date* was served by first class mail or electronically transmitted to all the parties listed in the matrix maintained in this case, including the following:

- (a) U.S. Trustee;
- (b) all parties on the mailing matrix;
- (c) those creditors holding unsecured claims against the Debtor's estate; and
- (d) any other parties on the mailing matrix.

Dated: February 28, 2020

Respectfully Submitted,

By: /s/ H. David Cox
H. David Cox, Counsel